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18 REED, and COASTAL PROTECTION  
RANGERS, INC.  
19

20 **UNITED STATES DISTRICT COURT**  
21 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**  
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23 CORY SPENCER, an individual;  
24 DIANA MILENA REED, an  
individual; and COASTAL  
25 PROTECTION RANGERS, INC., a  
26 California non-profit public benefit  
corporation,  
27

28 Plaintiffs,

CASE NO. 2:16-cv-02129-SJO (RAOx)

**PLAINTIFFS' OBJECTIONS TO  
DEFENDANT BRANT BLAKEMAN'S  
EVIDENCE IN SUPPORT OF HIS  
MOTION FOR SUMMARY  
JUDGMENT, OR IN THE  
ALTERNATIVE FOR SUMMARY  
ADJUDICATION OF CLAIMS**

Case No. 2:16-cv-02129-SJO (RAOx)

PLTFS.' OBJECTIONS TO DEFT. BRANT BLAKEMAN EVIDENCE IN SUPPORT OF MOTION FOR  
SUMMARY JUDGMENT, OR IN THE ALTERNATIVE FOR SUMMARY ADJUDICATION OF CLAIMS

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v.

LUNADA BAY BOYS; THE INDIVIDUAL MEMBERS OF THE LUNADA BAY BOYS, including but not limited to SANG LEE, BRANT BLAKEMAN, ALAN JOHNSTON AKA JALIAN JOHNSTON, MICHAEL RAE PAPAYANS, ANGELO FERRARA, FRANK FERRARA, CHARLIE FERRARA, and N. F.; CITY OF PALOS VERDES ESTATES; CHIEF OF POLICE JEFF KEPLEY, in his representative capacity; and DOES 1-10,  
  
Defendants.

Judge: Hon. S. James Otero  
Date: September 5, 2017  
Time: 10:00 a.m.  
Crtrm.: 10C

Complaint Filed: March 29, 2016  
Trial Date: November 7, 2017

Plaintiffs Cory Spencer, Diana Milena Reed and Coastal Protection Rangers, Inc. (collectively referred to as "Plaintiffs") hereby object to the following evidence presented by Defendant Brant Blakeman ("Defendant") in connection with Defendant's Motion for Summary Judgment or, in the Alternative, Summary Adjudication set for hearing on September 5, 2017, before this Court:

**A. OBJECTION TO DECLARATION OF RICHARD P. DIEFFENBACH IN SUPPORT OF DEFENDANT BRANT BLAKEMAN'S MOTION FOR SUMMARY JUDGMENT, EXHIBIT A**

<u>Evidence:</u>	<u>Objections:</u>
1. Declaration of Richard P. Dieffenbach, Ex. A.	1. This evidence is inadmissible because it has not been properly authenticated, the declarant has not stated facts

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<u>Evidence:</u>	<u>Objections:</u>
	<p>demonstrating that he has personal knowledge of the creation of the video, its contents, or what occurred in the video, and to the extent that it contains inadmissible hearsay. FRE 901, 602, 802. Additionally, this evidence is inadmissible because Defendant failed to serve Plaintiffs with this evidence, which he lodged with the Court in support of this Motion. (<i>See</i> Declaration of Lisa M. Pooley in Support of Plaintiffs' Opposition to Individual Defendants' Motions for Summary Judgment or, in the alternative, Summary Adjudication, ¶¶ 23-25.)</p>

DATED: August 7, 2017

HANSON BRIDGETT LLP

By:           /s/ Kurt A. Franklin            
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 LISA M. POOLEY  
 SAMANTHA D. WOLFF  
 TYSON M. SHOWER  
 LANDON D. BAILEY  
 Attorneys for Plaintiffs  
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 REED, and COASTAL PROTECTION  
 RANGERS, INC.